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10 Attorney for the United States

11
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 CAMERON JAMES KENNEDY,

18 Defendant.

2:18-CR-00080-RFB-GWF

**JOINT STIPULATION TO CONTINUE
MOTION DEADLINES & RULE 16
DEADLINES SET BY THE COURT**

19 IT IS HEREBY STIPULATED between the United States of America, by and
20 through Alexandra M. Michael, Assistant United States Attorney, and defendant
21 Cameron James Kennedy, by and through his counsel, Russell Marsh, Esq., to
22 respectfully request that the Court order that the parties shall have up to and
23 including May 31, 2018 to comply with Federal Rule of Criminal Procedure 16
24 disclosures.

25 IT IS FURTHER STIPULATED between the parties, to respectfully request
26 that the Court order that they shall have up to and including June 18, 2018, to file
27 any and all pretrial motions and notices of defense.
28

1 IT IS FURTHER STIPULATED between the parties, to respectfully request
2 that the Court order that they shall have up to and including July 2, 2018, to file
3 any and all responsive pleadings.
4

5 IT IS FURTHER STIPULATED between the parties, to respectfully request
6 that the Court order that they shall have to and including is July 6, 2018 to file any
7 and all replies to dispositive motions.
8

9 This stipulation is entered into for the following reasons:

10 1. The Defendant was appointed new counsel in the matter on May 2,
11 2018.

12 2. While not voluminous, the discovery in this case is extensive and new
13 counsel for defendant needs additional time in order to review the discovery
14 provided, determine whether any pretrial motions are necessary, and to comply
15 with their disclosure requirements under Rule 16 as the United States had made a
16 demand for reciprocal discovery.
17

18 3. While almost all discovery was provided to previously appointed
19 defense counsel, a few items have recently have come into the possession of the
20 United States which have been turned over immediately upon receipt. The United
21 States expects that discovery will be complete on or before May 31, 2018¹.
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27 ¹ The original Rule 16 deadline set by the Court was May 7, 2018 and pretrial motions were due
28 May 14, 2018. ECF No. 30. At that time, the Defendant wished to proceed to trial with his prior
counsel, Rebecca Levy, Esq., on the scheduled May 21, 2018 first trial setting. Trial is currently set
for August 6, 2018. ECF No. 44.

1 4. A denial of this request for the additional time to comply could result in
2 a miscarriage of justice.

3
4 Dated this 15th day of May 2018.

5 /s/ Alexandra M. Michael
6 ALEXANDRA M. MICHAEL
7 Assistant United States Attorney
8 Attorney for the United States

/s/ Russell Marsh
RUSSELL MARSH, Esq.
Attorney for Cameron James Kennedy

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CAMERON JAMES KENNEDY,

Defendant.

2:18-CR-00080-RFB-GWF

ORDER

IT IS THEREFORE ORDERED that the parties' disclosure under Federal Rule of Criminal Procedure 16 shall be made by May 31, 2018.

IT IS THEREFORE ORDERED that the parties herein shall have up to and including June 18, 2018, to file any and all pretrial motions and notice of defense.

IT IS FURTHER ORDERED that the parties shall have up to and including July 2, 2018, to file any all responses.

IT IS FURTHER ORDERED that the parties shall have up to and including July 6, 2018, to file any and all replies.

DATED this 17th of May, 2018.



RICHARD F. BOULWARE, II
United States District Judge